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10 Attorneys for Plaintiff and the Putative Class

11 **UNITED STATES DISTRICT COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 **Victorino Guerrero**, individually and on  
14 behalf of all similarly situated individuals;

15 Plaintiff,

16 vs.

17 **SPB Hospitality LLC**, a Delaware limited  
18 liability company; **Craft Brewery Group,**  
19 **LLC**, a Delaware limited liability com-  
20 pany, **Gordon Biersch Group LLC**, a  
21 Delaware limited liability company; and  
22 **Does 1-10**, inclusive;

23 Defendants.

CASE NO. 2:23-cv-09112-FMO-SK

[Assigned to Hon. Fernando M. Olguin]

**NOTICE OF SETTLEMENT OF  
ENTIRE CASE**

Case Filed: September 25, 2023

Removal Date: October 27, 2023

1           **TO THE COURT, AND TO ALL PARTIES AND THEIR COUNSEL OF**  
2 **RECORD:**

3           **PLEASE TAKE NOTICE** that Plaintiff Victorino Guerrero (“Plaintiff”) respect-  
4 fully submits this Notice of Settlement and requests as follows:

5           After a fulsome informal exchange of information, and in light of their factual investi-  
6 gation, Class Counsel does not believe that it appropriate to maintain the Class or Repre-  
7 sentative claims due to the burden of proof in proving those claims in light of the information  
8 provided by Defendants.

9           Alongside that determination, the Parties have reached an individual settlement in the  
10 above-captioned matter.

11           The Parties hereby respectfully request 15 days in which to file dispositional docu-  
12 ments, including a request for an order dismissing the class and PAGA claims without preju-  
13 dice, and further request that the Court vacate all currently pending hearings and related  
14 dates in this matter.

15  
16  
17 DATED: February 26, 2024

**KING & SIEGEL LLP**

18  
19 By: Elliot J. Siegel  
20 Elliot J. Siegel  
21 Attorneys for Plaintiff and the Putative  
22 Class  
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